UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION MDL No. 2875

Honorable Robert B. Kugler, District Court Judge

Oral Argument Requested

This Document Relates to All Actions

NOTICE OF DEFENDANTS' JOINT MOTION TO EXCLUDE THE OPINIONS OF LAURAR. CRAFT

PLEASE TAKE NOTICE that on May 1, 2023, or as soon thereafter as counsel may be heard, the undersigned Defendants shall move for entry of an Order excluding the opinions of Plaintiffs' expert, Laura R. Craft, pursuant to Federal Rules of Evidence 104, 702, and 703.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the undersigned Defendants shall rely upon the Memorandum of Law in Support of Defendants' Joint Motion to Exclude Opinions of Laura R. Craft submitted herewith, and any reply submissions made hereafter and the Certification of Alexia R. Brancato together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: March 13, 2023

Respectfully submitted,

/s/ Alexia R. Brancato

KIRKLAND & ELLIS LLP

Jay P. Lefkowitz
Devora W. Allon
Alexia R. Brancato
Brittney Nagle
601 Lexington Avenue
New York, New York 10022
Tel: (212) 446-5967
Fax: (212) 446-6460

Fax: (212) 446-6460 Lefkowitz@kirkland.com Devora.allon@kirkland.com Alexia.brancato@kirkland.com Bee.nagle@kirkland.com

Attorneys for Torrent
Pharmaceuticals Ltd. and Torrent
Pharma Inc.

GREENBERG TRAURIG, LLP

Lori G. Cohen
Victoria Davis Lockard
Steven M. Harkins
Terminus 200
3333 Piedmont Road, N.E., Ste. 2500
Atlanta, Georgia 30305
Tel: (678) 553-2100
Fax: (678) 553-2386

CohenL@gtlaw.com LockardV@gtlaw.com HarkinsS@gtlaw.com

Attorneys for Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., and Actavis LLC

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Jessica Davidson, Liaison Counsel for
Manufacturer Defendants
Allison M. Brown
One Manhattan West
New York, NY 1001
Telephone: (212) 735-2588
Facsimile: (917) 777-2588
jessica.davidson@skadden.com
allison.brown@skadden.com

Nina R. Rose 1440 New York Ave., N.W. Washington, D.C. 20005 Tel: (202) 371-7000 Fax: (202) 661-0525 nina.rose@skadden.com

Attorneys for Zhejiang Huahai Pharmaceutical Co, Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco Healthcare US, LLC

CERTIFICATE OF SERVICE

I, Alexia R. Brancato, an attorney, hereby certify that on March 13, 2023, I caused a copy of the foregoing document to be served on all counsel of record via CM/ECF.

/s/ Alexia R. Brancato
Alexia R. Brancato
Kirkland & Ellis LLP